

90674

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

ANTHONY FETT,

Plaintiff

Vs.

RUSH TRUCKING CORPORATION,d/b/a
RUSH TRUCKING; RUSH TRUCKING
COPRORATION, AND RUSH TRUCKING
CORP. OF MICHIGAN.

Defendant

1009L010749
ENCLOSURE ROOM A
TIME 00:00
Other

COMPLAINT AT LAW

NOW COMES the Plaintiff, ANTHONY FETT, by and through his attorneys,
REIBMAN, HOFFMAN, BAUM, HIRSCH & O'TOOLE and complaining of the
Defendants, RUSH TRUCKING CORPORATION d/b/a RUSH TRUCKING; RUSH
TRUCKING CORPORATION AND RUSH TRUCKING COPR. OF MICHIGAN,
states as follows:

1. That on September 11, 2007 RUSH TRUCKING CORPORATION d/b/a
RUSH TRUCKING; RUSH TRUCKING CORPORATION AND RUSH TRUCKING
COPR. OF MICHIGAN, was authorized to conduct business in the State of Illinois and
had a facility located at 5445 W. 73rd Street, in the City of Bedford Park, County of
Cook, State of Illinois.

2. That on or about said date, the Plaintiff was lawfully on the aforesaid
premises in the employment as a repairperson for Tire Services, Inc.

3. That on or about the aforesaid date, the Defendant's, RUSH TRUCKING

CORPORATION d/b/a RUSH TRUCKING; RUSH TRUCKING CORPORATION AND RUSH TRUCKING COPR. OF MICHIGAN, owed a duty to the Plaintiff, ANTHONY FETT, to see that he had a safe place to work.

4. That on or about the aforesaid date, while the Plaintiff, ANTHONY FETT, was upon said premises, and by reason and direct proximate result of the negligence of the Defendants, in whole or in part as hereinafter specified, a tire did then and there explode striking the Plaintiff, ANTHONY FETT, with great force and violence causing him to suffer severe and permanent injuries, great bodily pain and suffering as hereinafter described.

5. That at said time and place, the Defendants, RUSH TRUCKING CORPORATION d/b/a RUSH TRUCKING; RUSH TRUCKING CORPORATION AND RUSH TRUCKING COPR. OF MICHIGAN, then and there so carelessly, negligently and improperly did one or more of the following acts or omissions, which were the proximate cause, in whole or in part of the injuries sustained by the Plaintiff and his resulting permanent condition:

- a. Failed to warn the Plaintiff of the defective condition in the wheel and/or rim so he could adequately access the repair job, when the Defendant knew or should have known that the wheel/rim was damaged.
- b. Was otherwise negligent.

6. That by means of the premises and as a proximate result thereof, Plaintiff, ANTHONY FETT, was injured in her head, body and limbs, both externally and internally, and muscles, ligaments, tissues, nerves and blood vessels in her head, body and limbs were bruised, lacerated, torn and injured and she suffered great bodily

pain and injury, and mental anguish from then until now, and she will continue so to suffer in the future; that she has expended and will in the future expend large sums of money for medical expenses in endeavoring to be cured of said injuries; that she has lost and will in the future lose large sums of money by reason of being unable to follow her usual occupation as a result of said injuries.

WHEREFORE, Plaintiff, ANTHONY FETT, demands judgment against the Defendant, RUSH TRUCKING CORPORATION d/b/a RUSH TRUCKING, RUSH TRUCKING CORPORATION AND RUSH TRUCKING COPR. OF MICHIGAN, in a sum in excess of FIFTY THOUSAND (\$50,000.00) DOLLARS plus the costs of filing this lawsuit.

Respectfully submitted,

REIBMAN, HOFFMAN, BAUM, HIRSCH & O'TOOLE
Attorneys for Plaintiff

BY: 

REIBMAN, HOFFMAN, BAUM, HIRSCH & O'TOOLE
20 N. CLARK, SUITE 1700
CHICAGO, IL 60602
312/372-6367
ATTY: 90674

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ANTHONY FETT,)
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Plaintiff)
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Vs.)
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RUSH TRUCKING CORPORATION,d/b/a)
RUSH TRUCKING; RUSH TRUCKING)
COPRORATION, AND RUSH TRUCKING)
CORP. OF MICHIGAN.)
Defendant)

**AFFIDAVIT OF DAMAGES
SUPREME COURT RULE 222**

The undersigned being first duly sworn upon oath, deposes and States that he/she is the attorney for the plaintiff in the above titled cause of action seeking money damages or collection of taxes and states that cause of action.

☐

DOES NOT EXCEED \$50,000.00

☒

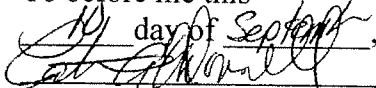
DOES EXCEED \$50,000.00

REIBMAN, HOFFMAN, BAUM, HIRSCH & O'TOOLE

BY: 

Subscribe and sworn

To before me this

 day of September, 2009

Notary Public

